

EXHIBIT 1

1 an efficiency aspect to ask them if we think it's
2 going to generate a very large record, it
3 will -- you know, by asking them up front this is
4 going to produce a very large record, is this what
5 you want, then it does save time and effort
6 downstream, sure.

7 Q. Okay. So my understanding
8 is -- correct me if I'm wrong. I'm just going to
9 tell you what my understanding is and you tell me
10 if I'm right.

11 A. Okay.

12 Q. My understanding is that for all
13 records the invoices are sent before the medical
14 records are sent out, so they're prepaid in
15 advance.

16 However, if a record is large enough, a
17 pre-bill might be sent out before the review team
18 reviews the record in full. And that pre-bill will
19 be an estimate of the final invoice amount.

20 And the actual charge in the end could be
21 modified up or down a little bit?

22 A. Correct.

23 Q. Okay. So but it is the policy at URM
24 that invoices are sent out and payment is made
25 before the records go out?

1 A. Yes.

2 Q. Okay.

3 A. Yes.

4 Q. So once the invoice is created and sent
5 out, assuming it was paid, what is the next step in
6 the process?

7 A. Repeat that last piece again.

8 Q. After the invoice is sent out --

9 A. Right.

10 Q. -- assuming that the person pays for
11 the records --

12 A. Right.

13 Q. -- what is the next step in the
14 process?

15 A. So the next step would then be to
16 distribute that record in whatever form the
17 requester has requested the record.

18 So if they want that record, if they want a
19 paper copy, then we're printing that record and
20 assembling that record.

21 Q. Let's just go back a second. Is there
22 a certain -- do you know what the page number is
23 that would trigger the practice of sending an
24 estimated or pre-bill in advance?

25 A. I don't.

1 used to operate the underlying database management
2 system for Record Jacket?

3 A. So it's a proprietary built relational,
4 you know, SQL based database system.

5 Q. But how --

6 A. That has a user interface built on top
7 of it that we built.

8 Q. So what kind of -- so there is a user
9 interface that was designed to operate --

10 A. Correct.

11 Q. -- the Record Jacket database
12 management system?

13 A. Right.

14 Q. So is there only one application used
15 to operate it or are there multiples?

16 A. As far as I know, just one.

17 Q. Do you know what program language it's
18 written in?

19 A. I don't.

20 Q. Is there a policy in effect right now
21 to preserve data in the Record Jacket system?

22 A. Yes.

23 Q. And what is the policy?

24 A. So we keep all data related to all
25 activity within -- that comes into our system.

1 Q. How long has that policy been in place?

2 A. Since the inception of the system.

3 Q. So can information in the database be
4 deleted?

5 A. It's too broad a question. What do you
6 mean? You have to be specific.

7 Q. If a user wanted to go in and delete
8 information in the database, would it permanently
9 delete that information?

10 A. I don't know what -- what capability
11 there is to delete information. It would
12 absolutely not at a general user level, so I don't
13 know.

14 We have fields like, you know, our
15 audit -- the audit trail automatically captures
16 traffic and data and it's permanent in the audit
17 trail, you can't delete that out.

18 We have transaction notes that are -- you
19 know, that the user cannot go in and it's a
20 locked -- you know, once the note goes in they
21 cannot change that note.

22 Q. You cannot delete transaction notes?

23 A. You cannot delete transaction notes.

24 Q. Has the Record Jacket database ever
25 been cloned?